LENAPE AREA VOCATIONAL TECHNICAL SCHOOL

SECTION: OPERATIONS

TITLE: SCHOOL SOCIAL MEDIA

ADOPTED: June 17, 2021

REVISED: January 15, 2026

816. SCHOOL SOCIAL MEDIA

Purpose

The purpose of this policy is to establish the process and standards for approval and operation of school-owned social media accounts, and to identify the differences between personally owned social media accounts and those maintained by the school.

The Joint Operating Committee respects freedom of expression; such expression will be free from interruption, except when it is in violation of law or Joint Operating Committee policy.

Definitions

Social Media – a category of Internet-based resources that integrate user-generated content and user participation to share information, ideas, personal messages and other content, including photos and videos. Social media includes **social networks**, which are online platforms where users can create profiles, share information and personal messages, and connect with others.

School-owned social media account – a social media account, regardless of platform, that is approved by the Joint Operating Committee and operated by a designated school employee(s) and is designed to further the educational mission of the school by providing information to the school community and general public.

Personal social media account – a social media account, regardless of platform, that is attributed to and operated by an employee, individual Joint Operating Committee member or student for personal use and is not approved by the Joint Operating Committee as an official communications channel of the school.

Designated public forum – created when a school-owned social media account is intentionally opened for use by the public as a place for expressive activity where members of the public may communicate, post or comment on information, subject to viewpoint neutral rules designated by the Joint Operating Committee. In terms of social media, this would include the ability of public users to comment on or reply to social media posts, pictures and videos.

Nonpublic forum – created when a school-owned social media account enables members of the public to read and receive school information, but the school has not designated opportunity for expressive activity by the public, and no commenting or posting of information by members of the public is permitted. In terms of social media, the ability to comment, post or reply is disabled on the school's account for public

	users.
Authority	The Joint Operating Committee shall approve all official social media accounts created and/or maintained as school-owned accounts.[1] All school-owned social media accounts shall display the official name of the school. The Joint Operating Committee establishes school-owned social media accounts as a **nonpublic forum** and directs school staff to disable functions allowing public users to comment or post information on school-owned social media accounts. **Exception To Nonpublic Forum Rule** There may be times when either the Administration or Joint Operating Committee seeks school community input on particular school related matters or issues. In such cases, one or more school-owned social media accounts may operate as a designated public forum, where the public may comment and interact with information posted by the school, subject to the Joint Operating Committee's established rules. The Joint Operating Committee approves the following rules when public interaction with school-owned social media accounts is authorized and directs staff to post this information on the school website and all social media accounts: The school will encourage community members to respond to posts and share comments that are constructive and courteous toward the school community. Statements and opinions expressed by visitors to the account do not reflect the opinions of the school. Questions regarding information should be directed to the building administrator or to the Administrative Director's office for school-wide information. The school may remove comments which are in clear violation of law or Joint Operating Committee policy, including but not limited to the following:[2][3][4][5] 1. **Sexual harassment, racial, ethnic, religious or nationality intimidation towards an individual or individuals in the school community.[6][7][8]** 2. **Disclosure of confidential personal information regarding students or staff.[9][10]** 3. **Speech that traditionally has not been protected under the First Amendment, such as obscenity, defamation and speech integral to criminal conduct.** 4. **Speech that is profane.** 5. **Speech that constitutes true threats such as inciting imminent lawless action or subjecting individuals to fear of violence.**

	6. Are spamming in nature (same comment posted repeatedly).
Intellectual Property Rights	**The illegal use of copyrighted, branded or trademarked materials or trade secrets is prohibited on school-owned social media accounts. All content shall be subject to copyright fair use guidelines and applicable laws, regulations and Joint Operating Committee policy and administrative regulations.[11]**
Delegation of Responsibility	The Joint Operating Committee designates the Director of Technology to oversee all school-owned social media accounts and serve at the primary contact person for school-owned social media accounts. The Administrative Director or designee shall notify students and staff about this policy through employee and student handbooks, posting on the school website and by other appropriate methods. All school staff assigned to monitor and maintain school-owned social media accounts shall receive training on: 1. Regularly reviewing school-owned social media accounts, in coordination with school's chief communications representative, to update, remove and/or correct information.[12] 2. Complying with confidentiality provisions of student and staff information, in accordance with applicable law, regulations and Joint Operating Committee policy and administrative regulations.[9][10] 3. Monitoring content for confidentiality and intellectual property violations, documenting potential violations, and notifying appropriate school staff to consider further action.[9][10][11] 4. Monitoring content for web accessibility standards and responding to public requests for accommodations.[6][8][13] 5. Monitoring public comments and responding, where appropriate, with clarification or redirection to additional information. 6. Monitoring public comments according to the Joint Operating Committee's established rules, documenting potential violations, and notifying appropriate center (school) staff to consider further action. Staff shall be provided training to assess comments in a viewpoint neutral manner, based on the Joint Operating Committee's approved rules, regardless of the specific subject matter of comments. The Joint Operating Committee authorizes designated school staff maintaining school-owned social media accounts to remove individual posts or comments by public users that violate the established social media rules of this policy. The Joint Operating Committee directs that review and consideration of posts or comments shall not discriminate on the basis of viewpoint, and staff must always be able to articulate the reason for removing a specific post, in accordance with Joint Operating Committee policy. Posts or comments not related to the requested matter or issue may be

	removed. Staff may consult with the Administrative Director or designee and the school solicitor in determining appropriate actions. Posts and comments may not be removed solely because they are critical of the school or school leadership, because they promote an unpopular opinion, or because of their viewpoint if the post or comment otherwise complies with the established social media rules. Designated school staff may block users from accessing or commenting on school-owned social media accounts when the outside account is identified as a security or system threat or spam account. Staff may consult with the Administrative Director or designee and the school solicitor in determining appropriate actions.
Guidelines	<u>Posting of Personally Identifiable Information</u> The Joint Operating Committee authorizes posting of student images in photos or videos depicting the educational process or school-related events on the school-owned social media accounts, unless the student's parents/guardians have opted out of sharing directory information under the Family Educational Rights and Privacy Act and Joint Operating Committee policy.[9][10][14][15] The Joint Operating Committee prohibits posting of other personally identifiable information of student on school-owned social media accounts without the consent of the parent/guardian, in accordance with applicable law, regulations and Joint Operating Committee policy and administrative regulations.[9][10] The Joint Operating Committee prohibits posting of staff images in photos or videos when a staff member has submitted a request to the Administrative Director or designee that their image not be publicly online. The Joint Operating Committee directs school staff to post images and information to social media accounts in a manner that protects the safety and security of students and staff, such as posting images without identification. <u>Accessibility</u> The Joint Operating Committee directs school staff who maintain school-owned social media accounts to post content that is accessible to individuals with disabilities, to the greatest extent possible based on the limitations of the platform. This shall include, but is not limited to:[6][7][8][16][17] 1. Including alternate text descriptions or captions for images. 2. Including captions for video content. 3. Avoiding text that is posted on an image. 4. Creating links and attachments in formats that are accessible to screen readers and other assistive technology. 5. Formatting text so that it is accessible to screen readers and other assistive technology. All school-owned social media accounts shall contain clear contact information that

may be used by members of the public to request accommodations or assistance.

Connecting with Other Social Media Accounts

Content or information posted to school-owned social media accounts shall not be connected to other social media accounts through linking or tagging if the outside account is for a commercial application, product or service and the school or its employees would receive financial or other compensation as a result of the connection.

School-owned social media accounts shall not be connected to social media accounts of individual students through linking or tagging.

School-owned social media accounts may be connected through linking or tagging to social media accounts of school-related groups when the content or information has been reviewed and approved by the school's chief communications representative.

Third-Party Social Media Accounts

Third-party social media accounts - a social media account, regardless of platform, that is operated by a volunteer, student, parent/guardian, alumnus or other member of the public on behalf of groups associated with the school. Third-party social media accounts are not operated by school employees or Joint Operating Committee members.

These accounts are privately created, maintained and are not actively monitored by the school. Third-party social media accounts are encouraged to add this line to their description, "This is not a school-owned social media account. The school is not responsible for the content or operation of this social media account."

Personal Social Media Accounts **of Joint Operating Committee Members**

School-owned social media accounts shall not **react, link to, post or otherwise interact with** private social media accounts of individual Joint Operating Committee members.

Joint Operating Committee **members are** strongly encouraged to use privacy settings on social media accounts and to clearly identify that it is their personal social media account and that it does not officially represent the Joint Operating Committee or school.

The Joint Operating Committee acknowledges that a Joint Operating Committee member's activity on their personal social media account could be deemed a public record and subject to a Right-to-Know request if the activity documents a transaction or activity of the school and is created, received or retained pursuant to law or in connection with a transaction, business or activity of the school.[19][20]

The Joint Operating Committee further recognizes that the determination of whether an activity on a Joint Operating Committee member's personal social media account qualifies as a public record must involve an analysis of the status of the account. Such analysis may include factors such as whether the account is either public or private and whether the account has the characteristics of an official school-owned social media account.

Personal Social Media Accounts of School Employees

School-owned social media accounts shall not react, link to, post or otherwise interact with private social media accounts of individual school employees.

School employees are strongly encouraged to use privacy settings on social media accounts and to clearly identify that it is their personal social media account and that it does not officially represent the Joint Operating Committee or school.

To maintain professional boundaries, school employees **must comply with Joint Operating Committee policy regarding online communication with students**.[21]

The school does not actively monitor personal social media accounts of current employees; however, the school reserves the right to address employees' job-related speech or employee speech posted on social media that has the potential to affect the school's operations. Speech that takes place off-site and on an employee's own time, including posting on personal social media accounts, may be addressed if the school establishes that the employee's expression infringed on the interests of the school in promoting the efficient and effective functioning and educational purpose of the school. If employee speech or expression would violate law or Joint Operating Committee policy in a traditional forum, it is also prohibited in an online forum. When an employee speaks as a citizen on a matter of public concern, the school shall consult with the school solicitor in determining the appropriate course of action, in accordance with applicable law, regulations and Joint Operating Committee policy. [2][22][23][24][25][26]

Student Use of Personal Social Media Accounts

Student use of personal social media accounts shall be addressed in accordance with appliable Joint Operating Committee policies and administrative regulations related to student conduct, expression and students' individual rights and responsibilities. In accordance with Joint Operating Committee policy, the school shall ensure that students are provided education on network etiquette and appropriate online behavior for students, including interaction with other individuals on social networking websites and in chat rooms, and cyberbullying awareness and response. [6][13][27][28][29][30][31][32]

Consequences

A school employee who violates this policy may be subject to disciplinary action, up to and including termination, in accordance with applicable law, regulations and Joint Operating Committee policy and administrative regulations.[21][25][33]

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Legal References
1. 24 P.S. 1850.1
2. U.S. Const. Amend. I
3. Lindke v. Freed, 601 U.S. 205 (2024)
4. Markey v. Thompson, 790 F. Supp. 3d 407 (E.D. Pa. 2025)
5. O'Connor-Ratcliff v. Garnier, 601 U.S. 205 (2024)
6. Pol. 103
7. Pol. 103.1
8. Pol. 104
9. Pol. 113.3
10. Pol. 216
11. Pol. 814
12. Pol. 911
13. Pol. 815
14. 20 U.S.C. 1232g
15. 34 CFR Part 99
16. 42 U.S.C. 12101 et seq
17. 29 U.S.C. 794
18. 28 CFR 35.160
19. 65 P.S. 67.102
20. Penncrest School District v. Cagle, 341 A.3d 720 (Pa. 2025)
21. Pol. 824
22. 24 P.S. 1122
23. 24 P.S. 2070.1a et seq
24. 22 PA Code 235.1 et seq
25. Pol. 317
26. Pol. 320
27. 24 P.S. 1303.1-A
28. 47 U.S.C. 254
29. Pol. 218
30. Pol. 220
31. Pol. 235
32. Pol. 249
33. Pol. 317.1
65 P.S. 67.101 et seq
Knight First Amendment Inst. at Columbia Univ. v. Trump, 928 F.3d 226 (2d Cir. 2019)

	Davison v. Randall, 912 F.3d 666 (4th Cir. 2019) Garcetti v. Ceballos, 547 U.S. 410 (2006) Mike Campbell v. Cheri Toalson Reish, 986 F.3d 822 (8th Cir. 2021) Pickering v. Board of Education, 391 U.S. 563 (1968) Connick v. Myers, 461 U.S. 138 (1983) Rankin v. McPherson, 483 U.S. 378 (1988) Pol. 801 Pol. 913 Copyright PSBA 2025